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Attorneys for Defendant Amis Integrity S.A.  
by restricted appearance

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF OREGON  
PORTLAND DIVISION

DRY BULK SINGAPORE PTE. LTD,

Plaintiff,

v.

Amis Integrity S.A., *in personam* and M/V  
AMIS INTEGRITY (IMO 9732412) her  
engines, freights, apparel, appurtenances,  
tackle, etc., *in rem*,

Defendants.

Case No. 3:19-cv-01671-BR

IN ADMIRALTY

DECLARATION OF BRUCE HSUEH IN  
SUPPORT OF RESPONSE IN  
OPPOSITION TO PLAINTIFF'S MOTION  
FOR LEAVE TO AMEND COMPLAINT

I, BRUCE HSUEH, declare as follows:

1. I am over the age of majority and, except as otherwise indicated, make this declaration on personal knowledge, and am competent to testify regarding the facts contained herein.

2. I am a Director of Wisdom Marine Lines S.A. ("Wisdom") and the Chief  
HSUEH DECL. IN SUPP. OPP. TO MOT. TO AMEND - Page 1  
[Case No. 3:19-cv-1671]

Financial Officer of Wisdom Marine Lines Co., Ltd. In my capacity as Director of Wisdom, I have extensive knowledge of the corporation's nationality, licensing, and business operations.

3. Wisdom is a Panamanian corporation. Wisdom's registered address is MMG Tower, 23rd Floor, Paseo Del Mar and Pacific Avenues, Costa Del Este, Panama City, Republic of Panama. Wisdom also maintains an office in Taiwan, located at 2nd FL., No. 237, Fu-Hsing S. Rd. Sec. 2, Taipei Taiwan 10667.

4. Wisdom does not conduct business in the State of Oregon. It is not licensed to do business in the State of Oregon; has no offices, property, employees, or shareholders in Oregon; has never advertised in Oregon; and has not sold products or services in Oregon. It has no agent or office in the United States. (The same is true of Amis Integrity S.A. and Wisdom Marine Lines Co., Ltd.)

5. Wisdom, at relevant times, was neither the owner nor the operator of the M/V AMIS INTEGRITY. Wisdom acted as manager of vessel operations on behalf of the Owners, Amis Integrity S.A. In this capacity, Wisdom facilitated the charter of the vessel to 24Vision in 2017, and later to The China Navigation Company Pte. Ltd. ("CNCO")—the charter in effect at the time of the arrest in October 2019.

6. The M/V AMIS INTEGRITY is a Panamanian flagged vessel with IMO No. 9732412 and the International Call Sign H9XQ.

7. Amis Integrity S.A. employs the crew, which generally consists of Chinese and Taiwanese citizens, through manning agencies, *e.g.*, Qingdao Enhance International Ship Management Co., Ltd. in the case of Chinese crew.

8. Under the charter party with 24Vision Chartering Solutions DMCC (“24Vision”), once Owners delivered the vessel the Master was under the orders and directions of 24Vision and 24Vision controlled and directed the vessel’s movements. Please refer to paragraphs 8(a) and 15 of the charter party. Owners placed the vessel at 24Vision’s disposal on/about July 14, 2017.

9. This is consistent with subsequent time charters of this vessel. The charterer directs the vessel’s movements. For example, at the time of the arrest in October 2019, the M/V AMIS INTEGRITY was under charter to The China Navigation Company Pte. Ltd. (“CNCO”). CNCO had directed the vessel to load grain cargo in Vancouver, Washington.

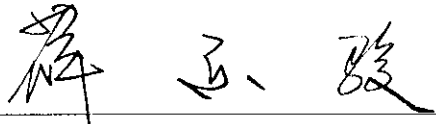
10. The vessel is engaged in international trade. At the time of withdrawal in July 2019, the vessel had called at Cape Town, South Africa, and was en route to the East Coast of South America.

11. Subjecting Wisdom to the jurisdiction of the federal district court for Oregon would be unreasonable and unduly burdensome under the circumstances:

- a. Wisdom has had no direct contact with Oregon;
- b. Wisdom is a Panamanian corporation with offices in Taiwan, and has no connections with Oregon, nor does it have an office or agent anywhere else in the United States;
- c. the withdrawal at issue occurred in International waters between Africa and South America, not in U.S. waters; and
- d. the Charter Party/ies provide that disputes be referred for arbitration in London and governed by English law.

I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE  
STATE OF OREGON AND THE UNITED STATES OF AMERICA THAT THE  
FOREGOING IS TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE AND  
BELIEF.

DATED this 12<sup>th</sup> day of March, 2020 at Taipei, Taiwan.

  
BRUCE HSUEH

**CERTIFICATE OF SERVICE**

I hereby certify that on March 13, 2020 I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all associated counsel.

I certify under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

Signed at Seattle, Washington this 13<sup>th</sup> day of March, 2020.

s/ Shelley Courter

Shelley Courter, Legal Assistant

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